

### REMARKS

In the Office Action dated September 4, 2008, claims 1-15 were rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter; claims 5-6 and 13-15 were rejected as being indefinite under 35 U.S.C. § 112, ¶ 2; claims 1-15 were provisionally rejected on the ground of non-statutory obviousness-type double patenting over Ayan (U.S. Patent Application Publication No. 2005/0119911 or “’911 Publication”); and claims 1-15 were rejected under 35 U.S.C. § 102(b) as being anticipated by Dusevic (U.S. Patent Application Publication No. 2002/0055868).

#### REJECTION UNDER 35 U.S.C. § 101

Claims 1-15 were rejected as purportedly directed to non-statutory subject matter based on the allegation that the claim does not specify “what happens after the step of ‘determining a first said desired product in response to the executing step’.” It is respectfully submitted that claim 1 does specify a result of the “providing,” “generating,” “selecting,” and “executing” tasks. The last clause of claim 1 specifies that a desired product is determined in response to at least executing the software modules of the first and second subsets, where the desired product includes a model of a reservoir to be produced by a well. The determination of such a reservoir model clearly constitutes a useful and tangible result.

The other claims similarly recite a useful and tangible result from tasks recited in the respective claims.

Therefore, withdrawal of the § 101 rejection based on the above-stated ground is respectfully requested.

The Office Action further rejected claims 3, 4, 10, and 11 based on usage of the phrase “program storage device.” As suggested by the Office Action, “program storage device” has been replaced with “computer-readable medium” in the above claims.

Therefore, withdrawal of the § 101 rejection based on this ground is also requested.

#### REJECTION UNDER 35 U.S.C. § 112, ¶ 2

The claims have been amended to remove the phrase “adapted to” to address this rejection.

#### DOUBLE-PATENTING REJECTION

Claims 1-15 were provisionally rejected on the ground of non-statutory obviousness-type double patenting over claims 1, 4, 5, 8-14 and 17-21 of U.S. Publication No. 2005/0119911. Since the '911 Publication has not issued as a patent, Applicant does not need to submit a terminal disclaimer at this time.

Upon issuance of a patent from the '911 Publication, Applicant will, **if appropriate**, submit a terminal disclaimer. Note that whether or not a terminal disclaimer is required at that time will be based on the then-pending claims of the present application and of the claims of the granted patent that issues from the '911 Publication.

#### REJECTION UNDER 35 U.S.C. § 102

All claims were rejected as anticipated by Dusevic.

Applicant respectfully submits that the subject matter of amended claim 1 is not disclosed by Dusevic. Claim 1 now recites:

- providing a first said user objective;
- providing a first set of input data selected from one or both of wellbore data and reservoir data;
- automatically generating a first workflow in response to the first user objective;
- automatically selecting a first subset of software modules of a first tool and a second subset of software modules of a second tool in response to the first workflow;
- executing one or more software modules of the first subset on a processor in response to said first set of input data;
- executing one or more software modules of the second subset on said processor in response to output from the one or more software modules of the first subset; and
- determining a first said desired product in response to at least executing the software modules of the first and second subsets, wherein the first said desired product includes a model of a reservoir to be produced by a well.

The Office Action cited primarily to Fig. 5 of Dusevic as purportedly disclosing various tasks of claim 1. Fig. 5 of Dusevic relates to using a task-centric method to locate content, in which one or more tasks and subtasks are displayed in response to user selection, along with the display of task details in response to user selection. Displaying information regarding tasks and

subtasks in response to user selection does not provide any hint of providing a first set of input data selected from one or both of wellbore data and reservoir data, automatically generating a first workflow in response to a first user objective, automatically selecting a first subset of software modules of a first tool and a second subset of software modules of a second tool in response to the first workflow, executing one or more software modules of the first subset on a processor in response to the first set of input data, and executing one or more software modules of the second subset on the processor in response to output from the one or more software modules of the first subset.

Moreover, the Office Action also incorrectly cited ¶ [0037] of Dusevic as purportedly disclosing the “executing” clause of claim 1. The cited paragraph refers to executing software to provide the user with a user interface to the task-centric, online environment. Executing the user interface software to display a user interface, as taught by Dusevic, is completely unrelated to executing one or more software modules of a first subset in response to a set of input data selected from one or both of wellbore data and reservoir data, and then executing one or more software modules of the second subset on the processor in response to output from the one or more software modules of the first subset, where a reservoir model is determined in response to the executing tasks.

In view of the foregoing, it is respectfully submitted that claim 1 is clearly not anticipated by Dusevic.

Independent claims 3 and 5 are similarly allowable over Dusevic.

Independent claim 7 recites a method that comprises:

- providing said user objective and providing input data selected from one or both of wellbore data and reservoir data;
- generating a specific workflow corresponding to said user objective;
- selecting a plurality of software modules in response to said specific workflow, said plurality of software modules including a first subset of software modules having a first predetermined sequence, and a second subset of software modules having a second predetermined sequence;
- executing said software modules of the first subset in said first predetermined sequence in response to said input data;
- executing said software modules of the second subset in said second predetermined sequence in response to output of the first subset of software modules; and
- generating said final product when the execution of said plurality of software modules is complete, wherein said final product includes a model of a reservoir to be produced by a well.

For similar reasons as those stated above with respect to claim 1, Dusevic clearly does not provide any teaching of the above combination of elements.

Independent claims 10 and 13 are similarly allowable over Dusevic.


Dependent claims, including newly added dependent claims 16-33, are allowable for at least the same reasons as corresponding independent claims.

Allowance of all claims is respectfully requested.

The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 20-1504 (SHF.0002US).

Respectfully submitted,

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